

**Dr. Russell Lamb**

Dr. Russell Lamb, an economist offered on behalf of the Direct Purchaser Plaintiffs and End Payor Plaintiffs, opines that the relevant antitrust market includes brand and generic Suboxone tablets and film, and that Reckitt maintained or enhanced its market power as a result of its anticompetitive scheme. Dr. Lamb also opines that Reckitt's conduct – including but not limited to its large, irrational, brand Suboxone tablet price hikes – was an anticompetitive interrelated scheme that impaired generic competition. In addition, in order to calculate the amount of Suboxone film sales that Reckitt would have made absent its anticompetitive scheme, Dr. Lamb performed an “analog analysis” in which he applied objective criteria to identify similar product reformulations with similarly large sales, during the relevant time period, where the product reformulation also enjoyed thirty months without generic competition as to the older formulation (just as Suboxone film was on the market for thirty months before generic Suboxone tablets launched), and then calculated the average uptake of those analog reformulations; Dr. Lamb confirmed the reliability of his analog analysis by reviewing Reckitt documents showing that it also considered product reformulation analogs with similar uptake rates. Dr. Lamb also opines on behalf of the Direct Purchaser Plaintiffs that the Direct Purchaser Class suffered classwide injury as a result of Reckitt's anticompetitive conduct, and opines regarding the amount of damages suffered by the Direct Purchaser Class. On rebuttal, Dr. Lamb responds to the opinions of Reckitt's economist Dr. Normann regarding the relevant antitrust market, Reckitt's market power, whether Reckitt's conduct was anticompetitive, the reliability of Dr. Lamb's analog analysis, whether there was classwide injury to the Direct Purchaser Class, and the amount of damages suffered by the Direct Purchaser Class. Dr. Lamb also responded to Dr. Curtis concerning the surveys her company performed on behalf of Reckitt. Dr. Lamb's opening and rebuttal merits reports were each 140 pages.